

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

FIREMAN'S FUND INSURANCE
COMPANY

CIVIL ACTION NO.:
04-11578 PBS

v.

FIRE SYSTEMS, INC.;
FIRE SUPPRESSION SYSTEMS OF
NEW ENGLAND, INC.;
PRO CON, INC.
and
PAQUETTE ELECTRIC COMPANY, INC.:
Defendants

OCTOBER 21, 2004

26(a) INITIAL DISCLOSURES

A. INDIVIDUALS WHO MAY POSSESS DISCOVERABLE INFORMATION

- A. Joseph Feters
Fireman's Fund Ins. Co.
PO Box 401
Exeter, NH 03833
- B. Richard R. Papetti
GAI Engineers
378 Page Street – Bldg. #10
Stoughton, MA 02072
- C. Bruce Swerling
Doug Maxwell
Swerling Milton Winnick
36 Washington St. Suite 310
Wellesley Hills, MA 02481
- D. Walter F. Jackson
Hydro Environmental Technologies, Inc.
54 Nonset Path
Acton, MA 01720

E. Robert Karol
Dan Wolf
Hodan Properties
PO Box 177
New London, NH 03257

F. Covino Environmental Associates, Inc.
300 Wildwood Avenue
Woburn, MA

G. Shannon Smith
Residence Inn
181 Faunce Corner Road
North Dartmouth, MA

H. Joseph Franco
Craig/IS Ltd.
PO Box 40569
Jacksonville, FL 32203

B. DOCUMENTS SUPPORTING PLAINTIFF'S CLAIM

See attached.

C. COMPUTATION OF DAMAGES

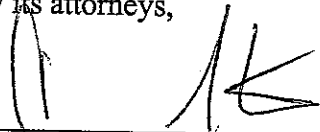
\$1,828,483.34 paid to insured. See supporting documents attached.

D. INSURANCE AGREEMENT

Not applicable.

FIREMAN'S FUND INSURANCE COMPANY

By its attorneys,



Erik Loftus, Esquire (BBO# 656315)
Law Offices of Stuart G. Blackburn
Two Concorde Way
P.O. Box 608
Windsor Locks, CT 06096
(860) 292-1116

CERTIFICATION

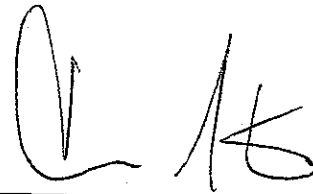
I hereby certify that the foregoing 26(a) INITIAL DISCLOSURES has been mailed this 21st day of October 2004, first class mail, postage prepaid to the following:

Gordon L. Sykes, Esq.
Morrison, Mahoney & Miller
10 North Main Street
Fall River, MA 02722
(Fire Systems, Inc.)

Jocelyn M. Sedney, Esq.
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One Exeter Plaza
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(Fire Suppression Systems of New England, Inc.)

Jon S. Hartmere, Esq.
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262 Washington Street, Suite 601
Boston, MA 02108
(Pro Con, Inc.)

David D. Dowd, Esq.
Curley & Curley, PC
27 School Street
Boston, MA 02108
(Paquette Electric Co, Inc.)

A handwritten signature in black ink, appearing to read 'Erik Loftus', written over a horizontal line.

Erik Loftus, Esq.